

UNITED STATES DISTRICT COURT
MIDDLE DISTRICT OF NORTH CAROLINA

VOTO LATINO, et al.,

Plaintiffs,

v.

ALAN HIRSCH, in his official capacity as
Chair of the State Board of Elections, et al.,

Defendants.

Case No. 1:23-cv-861-TDS-JEP

DEMOCRATIC NATIONAL
COMMITTEE, et al.,

Plaintiffs,

v.

ALAN HIRSCH, in his official capacity as
Chair of the State Board of Elections, et al.,

Defendants.

Case No. 1:23-cv-862-TDS-JEP

JOINT MOTION FOR ENTRY OF CONSENT JUDGMENT

All parties in *Voto Latino, et al v. Hirsch, et al.*, (Case No. 1:23-cv-861),¹ and all
parties in *Democratic National Committee, et al., v. Hirsch, et al.*, (Case No. 1:23-cv-862),²

¹ The Parties in *Voto Latino* are as follows: (1) Plaintiffs, Voto Latino, the Watauga County Voting Rights Task Force, Down Home North Carolina, and Sophie Jae Mead; (2) the North Carolina State Board of Elections Defendants (Karen Brinson Bell, Alan Hirsch, Jeff Carmon, Stacy Eggers IV, Kevin Lewis, and Siobhan O'Duffy Millen); (3) the Watauga County Board Defendants (Michael Behrent, Eric Eller, Matt Walpole, Leta Councill, and Elaine Rothenberg); (4) the Legislative Intervenors (Philip E. Berger and Destin Hall); and (5) the RNC Intervenors (Republican National Committee, North Carolina Republican Party, Virginia A. Wasserberg, and Brenda M. Eldridge)

² The Parties in *Democratic National Committee* are as follows: (1) Plaintiffs, Democratic National Committee and North Carolina Democratic Party; (2) the North Carolina State Board of Elections

(hereinafter the “Joint Parties”), respectfully move the Court for entry of the attached Stipulation and Consent Judgment, Exhibit 1 to this Motion. The Joint Parties respectfully request that the Court sign and enter the Consent Judgment filed as Exhibit 1 as its final order and judgment in this case. Identical copies of this Motion and the Consent Judgment are being filed in both Nos. 1:23-cv-861 and 1:23-cv-862.

Respectfully submitted, this the 22nd day of April, 2025.

NORTH CAROLINA DEPARTMENT
OF JUSTICE

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* Local Rule 83.1(d) special appearance

Counsel for Plaintiffs Democratic National Committee and North Carolina Democratic Party in matter 1:23-cv-862.

CERTIFICATE OF SERVICE

I hereby certify that I filed the forgoing document using the Court's CM/ECF System which will send notification to all counsel of record.

This the 22nd day of April, 2025.

**NELSON MULLINS RILEY &
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